



**Solutia Inc.**  
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April 19, 1999

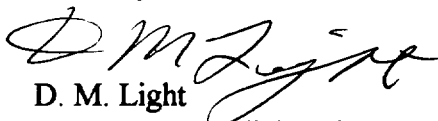
Mr. Michael McAteer  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)**  
• **April 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the April 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

  
D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

cc:

T. Gouger - USACE  
P. Takacs - IEPA  
Mayor M. King - Cahokia  
Sauget File - Solutia

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** April 19, 1999  
**Period Covered:** March 18, 1999 - April 19, 1999  
**Next Report Period:** April 19, 1999 - May 18, 1999

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#### **Work Performed during the reporting period**

- None

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#### **Work scheduled for next reporting period**

- None

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#### **Problems and Solutions**

- None

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#### **Submittal Schedule Status (see attached)**

- On March 19, 1999, U. S. EPA issued a 37 page response and disapproval of Solutia's February 22, 1999 Support Sampling Plan (SSP) submittal.
- A revised SSP was submitted to U. S. EPA April 9, 1999 for review and approval.
- A Revised AOC schedule is attached pursuant to Solutia's March 17, 1999 request and U. S. EPA's March 19, 1999 response.
- An access agreements status summary and request for schedule extension was submitted to U. S. EPA April 19, 1999.

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#### **Issues under review**

- **Dead Creek Flooding** - Solutia continued to evaluate a proposal by EPA to design and install some early (pre-EECA/RIFS study) flooding improvements focused on the undersized or otherwise constricted culverts along Dead Creek. It is contemplated that this Work would be conducted under a UAO or AOC to be negotiated between U. S. EPA and Solutia.
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## **Comments**

1. The focus during the next report period will be on review and approval of the SSP.
2. Access Agreements' procurement will continue on a high priority basis.

**January 21, 1999 Sauget Area I AOC**

**SCHEDULE**  
**( 3/22/99 Revision)**

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|--|---|
| 1. Designation of Contractor                         | Completed 3/10/99 <sup>1</sup>                      |
| 2. Designation of Other Contractors                  | 5 Business Days Before Start of Work                |
| 3. Designation of Project Coordinator                | Completed   |
| 4. Submit Support Sampling Plan (SSP)                | Submitted February 22, 1999                         |
| 5. Submit Revised SSP                                | April 9, 1999 <sup>2</sup> (Completed 4/9/99)       |
| 6. Obtain Access Agreements                          | April 19, 1999 <sup>3</sup> (Status submitted 4/19) |
| 7. Submit Health and Safety Plan (HASP)              | With Revised SSP (Item 5) submittal                 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | With Revised SSP (Item 5) submittal                 |
| 9. Sampling Notification                             | 10 Business Days Prior to Start of Work             |
| 10. Submit Data Report                               | TBD (Pending approval of SSP Work Schedule)         |
| 11. Submit EE/CA Report                              | 60 Calendar Days After Data Report Submittal        |
| 12. Submit Revised EE/CA Report                      | 21 Calendar Days After Receipt of EPA Comments      |
| 13. Submit RI/FS Report                              | 90 Calendar Days After Data Report Submittal        |
| 14. Submit Revised RI/FS Report                      | 21 Calendar Days After Receipt of EPA Comments      |
| 15. Progress Reports                                 | Monthly Beginning February 19, 1999                 |

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<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

<sup>2</sup> Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of USEPA comments from the February 22, 1999 SSP submittal". USEPA comments on the 2/22/99 SSP submittal were received 3/19/99.

<sup>3</sup> Per 3/19/99 email from M. McAteer to M. Light, AOC schedule modified to "30 days from receipt of this note", dated March 19, 1999.